

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 4:17-cv-2455 CDP
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

MOTION TO DISSOLVE PRELIMINARY INJUNCTION AND TO DISMISS

Defendant City of St. Louis respectfully moves the Court, pursuant to F.R.Civ.P. 60(b) and 65, to dissolve the preliminary injunction heretofore entered in this cause and to dismiss the second amended complaint for lack of equitable jurisdiction. Defendant files a Memorandum in Support concurrently herewith. In further support of this motion, defendant relies on the following supplementary exhibits in addition to the record of the preliminary injunction hearing:

- A. Catalog of protest activity in City of St. Louis 3/15/12 through 7/24/18 and authenticating declaration of Charles Wall.
- B. Operations Order 9/17 [redacted].
- C. Video excerpts of protest activity during daylight September 15, 2017 (flash drive filed with Clerk's office).
- D. Video excerpts of protest activity during night of September 15, 2017 (DVD filed with Clerk's office).
- E. Video excerpts of protest activity during September 17, 2017 (DVD filed with Clerk's office).
- F. Video excerpts of protest activity on October 3, 2017 (DVD filed with Clerk's office).

- G. Compilation of video of protest activity, September 15-October 3, 2017, in defendant's possession (external drive filed with Clerk's office).
- H. Declaration of John McLaughlin.
- I. Declaration of Sgt. Charles Wall regarding preparation and authentication of video exhibits C-G.
- J. Compilation of injury claims filed by St. Louis police officers attributable to protests in fall of 2017.
- K. Deposition of James Golden (plaintiff's expert witness).
- L. Deposition of Plaintiff Maleeha Ahmad.
- M. Deposition of Plaintiff William Mobley.
- N. Deposition of Plaintiff Pamela Lewczuk.
- O. Deposition of Randy Jemerson.
- P. Deposition of Scott Boyher.
- Q. Deposition of Brandon Wyms.
- R. Deposition of Matthew Karnowski.
- S. Deposition of Mark West.
- T. Deposition of Jerome Baumgartner.
- U. Deposition of Ann Chance.
- V. Video excerpts of incident at Page and Walton in 2015 and authenticating affidavit (filed in *Molina v. City of St. Louis*)(flash drive filed with Clerk's office).
- W. Deposition of Joshua Becherer.

Respectfully submitted,
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